

**Rule 21 Working Group Meeting No. 49**  
**Oakland, California, October 30, 2003**  
**Meeting Minutes**

Attendees:

Scott Tomashefsky, Chair

We apologize that the exact list of attendees is not available for these minutes. The meeting was well-attended by the usual participants.

1. The next Working Group Meeting (No. 50!!!) will be held in Oakland on Tuesday, December 2, 2003.
2. PG&E is planning to hold an Interconnection Workshop for its customers and interested developers in early December. The meeting, originally scheduled for December 3 in Oakland, will be held on December 10 in San Ramon.
3. Working Group Meeting No. 51 will probably be held in San Diego as an appendage to the CADER Conference in San Diego in late January 2004.
4. The CRS exemption tariff was approved by the CEC, is going through administrative processes and is expected to become effective January 22.
5. Plug Power Certification was approved by Committee and will be posted on the web.
6. Hess has submitted additional test data and is currently under review.
7. The Supplemental Review document has not been changed since January 2003. There have been several potential changes in process but so far nothing has been finalized.
8. The California Interconnection Guidebook is complete and is now available on an SAIC website. It will soon be posted on the CEC website as well. The Guidebook does not replace Rule 21 in any way. It is intended to provide guidance to the Applicant.
9. The Cost-Effectiveness study related to interconnection is being developed. Each of the three IOUs provided information on which of their Applications were approved following Initial Review, following Supplemental Review and following a formal Study.
10. Utility DG monthly reports were discussed. A recent trend is that a few Edison customers with DG are converting from non-export to inadvertent export; others are converting from QF status to DG status. These "recycled" projects are currently double counted. Tom Dossey will propose a standardized format next time.
11. There is a new Assembly Bill allowing Net Metering for fuel cells. It tended to follow the digester gas bill, and the fuel cells may use natural gas.
12. The PG&E White Paper was distributed at the last meeting. The White Paper expresses PG&E's requirements for interconnection in accordance with Rule 21. PG&E would like to work with others to look at speed-bumps within the White

Paper and evaluate what it would take to change the White Paper requirements. PG&E is in active discussions with certain DG developers and when it resolves issues with them it would like to offer those resolutions to others. PG&E would like to work collaboratively and offers to develop a “speed-bump” matrix with a view to resolution.

13. There are concerns that PG&E is imposing additional requirements over and above Rule 21 through the White Paper. PG&E believes that the White Paper is in compliance with Rule 21.
14. Jerry Jackson brought up the new issue of a renter signing a Net Energy Metering agreement, and then moving out. How does the Utility transfer the Net Metering Agreement? Jerry will set up an action item for this.
15. Jackson brought up the issue of sunset dates for applications. How long should they last? Should fees be refunded? Partially?
16. Utilities are evaluating the potential impact of DG on network systems. PG&E has engaged a consultant to study the issue. As it learns more, PG&E will share what it can with the Working Group. PG&E owns the biggest network system in the western US; a DG-Networks conference is in the works. PG&E did this effort on its own. There are only a few applications for DG on Network applications, because only a few customers are on such systems. Mo will set up an action item for this.
17. Werner had a question on whether PG&E had filed the AB58 Advice Letter. PG&E is almost ready to file the letter.

#### Afternoon Discussion: Technical

18. The Technical breakout discussed priorities. Noting the intention of the Policy group to develop modified Rule language for a first-of-the-year Advice Filing, there was clear support in the technical breakout for focusing efforts on adopting IEEE 1547. While it is not realistic to try to meet an end-of-the-year schedule, the group was confident that the majority of IEEE 1547 issues could be resolved in the first quarter. To that end, a separate 2-day meeting to focus on IEEE 1547 adoption was tentatively scheduled for Nov 19-20 in San Diego.
19. Bill Cook, champion of T105 (Inadvertent Export) was unable to attend the meeting, thus no progress was made on that task.
20. Fairly substantive comments were received on T107 (Alternate Tests) from Bassler, were briefly discussed in the Technical Breakout.. Moh Vaziri will incorporate changes and investigate a few questions that were raised.
21. Lastly, the group discussed C101 (Export Screen). PG&E presented their analysis of the reverse-power export limit proposed for Option 3 and convinced the group that this could result in more export than was intended. A proposal was made to drop Option 3 entirely and, after a brief discussion, the group voted almost unanimously against the proposal. There remain several basic issues of debate on the Export Screen:
  - Is an answer of “No” to the approved Export Screen title, “Will power be exported across the PCC?” in conflict with the intent of Option 3, which

allows some “incidental” export? The group had previously determined that the title should be changed to reflect the intention that this would allow for some export, but PG&E objects to changing the title

- Was the original intent of the word “incidental” meant to be “small” or “accidental”? The answer to this question supports one or the other interpretation of the previous question

#### Afternoon Discussion: Policy

22. A major part of the session was spent on deciding when to file Advice Letters that update Rule 21 and what those Advice Letters should include. It was decided to establish a new “compilation document” version of Rule 21, using PG&E’s latest Rule 21 as the starting point. To this would be added the Net Metering changes that Tom Dossey has been developing, the Werner Bin List changes, and any changes from integrating IEEE 1547 into Rule 21. If agreement by the Working Group for these changes can be achieved by the end of the year, then each IOU could present the changes to its management for Advice Letter filings early in the new year.
23. The revised Application form was also worked upon during the afternoon session.
24. It was decided that the December 2 Working Group meeting would split directly into Technical and Process Groups in the morning and focus exclusively on language revisions to Rule 21. Each of the participants was requested to provide comments prior to the Thanksgiving Holidays in order to allow the comments to be incorporated into the Compilation Document.

Respectfully Submitted.

Edan Prabhu

Approved:

Scott Tomashefsky

Afternoon Session: Process